

III. REMARKS

Claims 1-40 are pending in this application. No claims have been amended, and no claims have been cancelled herein. Applicants are not conceding in this application that any claims are not patentable over the art cited by the Examiner, as any claim amendments that have been made are only for facilitating expeditious prosecution of the allowable subject matter noted by the examiner. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-3, 5-12, 14-27, 29-38, and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Maurille (U.S. Pat. No. 6,484,196, hereinafter, "Maurille"), in view of Newman (U.S. Pat. No. 7,003,724, hereinafter, "Newman"), and further in view of Borwankar (U.S. Pat. No. 6,594,693, hereinafter, "Borwankar"). Applicants respectfully traverse these rejections for reasons explained below.

With respect to claim 1, Applicants submit that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, Applicants respectfully submit that the combined references fail to teach or suggest, *inter alia*, "...a conversation map for illustrating relationships between messages in the conversation, wherein the conversation map changes according to the branch of messages displayed in the second column" (claim 1, lines 6-8). The Office admits, on page 3 of the Final Office Action of July 17, 2007, that Maurille and Newman do not teach or suggest "a conversation map..." but cites Borwankar at col. 11, lines 7-42, FIG. 6, and FIG. 7 at steps 710 and 718 to cure the deficiency of the combined disclosures. Applicants have interpreted the

Borwankar reference differently, as will be explained below. Accordingly, Applicants respectfully submit that Borwankar does not cure the deficiency of Maurille and Newman.

Applicants submit that Borwankar's "schematic diagram" (col. 11, line 7), depicted at FIG. 6, merely comprises a graphical representation of "the organization (directory or file structure stored on the client machine) of conversations, topics, and messages for a single participant" (col. 11, lines 7-9) by clarifying the storage "structure" according to which messages are arranged and saved on a client computer (col. 11, lines 10-12). Applicants submit that the diagram itself is not actually a usable, dynamic part of the invention as would be practiced by a client or user. Instead, Applicants submit that the purpose of FIG. 6 is to simply to clearly disclose and further convey the classification and storage system of which Borwankar conceives for saving "information associated with each message inform[ing] the user of the history of the message" (Col. 11, lines 30-32). There is no evidence in Borwankar's disclosure that it was contemplated that this schematic diagram would ever actually be visible to, much less used or manipulated by, a client. This interpretation comports with more general comments throughout the disclosure, characterizing Borwankar's invention as "an online group messaging application that ... has strong structure and persistence" (col. 6, line 17-20).

With respect to FIG. 7 at steps 710 and 718, also cited by the Office, Applicants respectfully submit that these steps also do not disclose "a conversation map ... wherein the conversation map changes according to the branch of messages displayed in the second column" (claim 1, lines 6-8). Rather, at step 710, the conversation and topic are added "to the participant's meta information, described with respect to FIG. 6 at block 600 and appropriate lists thereunder, as shown in block 602." (Col. 12, lines 3-5.) This "add[ition to a] participant's 'meta information,'" or information about information, impacts, as described above, the structure

and organization (e.g., lists) according to which a message is stored, but does not teach or suggest the generation of a “conversation map” (claim 1, line 1 [emphasis added]) of any kind. Likewise, at step 718 in FIG. 7, a “participant can choose to keep those messages for as long as necessary or can delete them to free space for new messages” (col. 12, lines 16-18), but neither a map nor any “changes according to the branch of messages displayed in the second column” (claim 1, line 8) are taught or suggested.

Because, as the Office has noted, Maurille and Newman do not teach or suggest a multi-column user-interface comprising in relevant part, “a conversation map...”, and, as described above, Borwankar also fails to recite such a map, Applicants respectfully request the withdrawal of the rejection to claim 1 under 35 U.S.C. § 103(a).

With respect to the rejections of independent claims 20 and 30, Applicants note that each of these claims includes features similar in scope to those already addressed above with respect to claim 1. Further, the Office relies on the same arguments and interpretations of Maurille, Newman, and Borwankar as discussed above with respect to claim 1. To this extent, Applicants herein incorporate the arguments presented above with respect to claim 1, and respectfully request withdrawal of the rejections of claims 20 and 30 for the above-stated reasons.

With respect to dependent claims 2, 3, 5-12, 14-19, 21-27, 29, 31-38, and 40, Applicants respectfully submit that these claims are allowable for reasons stated above relative to independent claims 1, 20, and 30, as well as for their own additional claimed subject matter. Accordingly, Applicants respectfully request that the Office withdraw the rejections under 35 U.S.C. § 103(a) to claims 2, 3, 5-12, 14-19, 21-27, 29, 31-38, and 40.

In the Office Action, claim 4 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Maurille in view of Newman and Borwankar, and further in view of Baker (U.S. Pat. No.

6,546,417); and claims 13, 28, and 39 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Maurille in view of Newman and Borwankar, and further in view of Tang *et al.* (U.S. Pat. No. 5,793,365). Applicants respectfully submit that these claims are allowable for reasons stated above relative to independent claims 1, 20, and 30, as well as for their own additional claimed subject matter. Accordingly, Applicants respectfully request that the Office withdraw the rejections under 35 U.S.C. § 103(a) to claims 4, 13, 28, and 39.

IV. CONCLUSION

Applicants respectfully submit that the Application as presented is in condition for allowance. Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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